

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

BRADLEY J. SCHAUFENBUEL;)
ROBERT N. SCHAUFENBUEL;)
JOHN AND SARAH REED, IV;)
JOHN AND JAN REED, III;)
AMERICAN MASS MEDIA CORPORATION;)
ROBERTA K. CLARK;)
on behalf of Themselves and All Others)
Similarly Situated,)

Plaintiffs,)

V.)

INVESTFORCLOSURES FINANCIAL, L.L.C.;)
ROI DEVELOPERS;)
INVESTFORCLOSURES;)
INVESTFORCLOSURES.COM, LLC;)
INVESTFORCLOSURES VENTURES, LLC;)
SANDS OF GOLD ESCROW;)
SANDS OF GOLD;)
ROI FINANCIAL;)
REALTY OPPORTUNITIES INTERNATIONAL)
ESCROW 23;)
ROI ESCROW;)
REALTY OPPORTUNITIES INTERNATIONAL)
S. de R.L. de C.V.;)
REALTY OPPORTUNITIES INTERNATIONAL;)
ROI MEXICO;)
SANDS OF GOLD ESTATES;)
FRANCIS X. SANCHEZ aka FRANK SANCHEZ;)
JAMES D. BOURASSA aka JIM BOURASSA;)
SCOTT D. WESSEL;)
DEANA M. GUIDI;)
DANIEL E. FITZGERALD aka DAN)
FITZGERALD;)
SCOTT R. SLAGLE;)
DARCEY L. MARTIN;)
TOM RODRIGUEZ; and)
JOHN DOES 1 – 30,)

Defendants.)

Case No. _____

Judge: _____

JURY DEMAND

SECURITIES CLASS ACTION CERTIFICATION

I, John Reed, IV, on oath depose, state and certify as follows:

1. I currently reside at 2304 S. 79th Ave, Yakima, WA 98903, make this Affidavit upon my personal knowledge, and if called upon to do so am competent to testify on the matters set forth herein.

2. I have reviewed the Class Action Complaint in which I am named as Plaintiff and have authorized its filing.

3. I did not purchase the IFC security / investment certificate that is the subject of the Complaint at the direction of Plaintiffs' counsel or in order to participate in any private action arising under the Securities Act of 1933, 15 U.S.C. §77a *et seq.*, or the Securities Exchange Act of 1934, 15 U.S.C. §78a *et seq.*

4. I am willing to serve as a representative party on behalf of a class, including providing testimony at deposition and trial, if necessary.

5. On April 6, 2005, I purchased from InvestForClosures an investment certificate representing account number 204017, for a total consideration of \$40,000.00.

6. On September 12, 2005, I purchased from InvestForClosures another investment certificate on the same account number 204017 for an additional consideration of \$40,000.00.

7. On March 30, 2007, I invested an additional \$10,000.00 in IFC's newly created Special Opportunities Plan ("SOP") and moved my accrued interest in IFC to the SOP account.

8. My total investment with IFC is \$90,000.00.

9. No other actions have been filed under the Securities Act of 1933, 15 U.S.C. §77a *et seq.*, or the Securities Exchange Act of 1934, 15 U.S.C. §78a *et seq.* during the 3 year period preceding the making and signing of this Certification, in which I have sought to serve or have served as a representative party on behalf of a class.

10. I will not accept any payment for serving as a representative party on behalf of a class beyond my pro rata share of any recovery, except as ordered or approved by the court in accordance with the provisions regarding recovery by plaintiffs in the statutes.

FURTHER AFFIANT SAYETH NAUGHT.



John Reed, IV

STATE OF WASHINGTON)
) ss.
COUNTY OF Yakima)

I hereby certify that John Reed, IV of Yakima County, Washington, personally known to me to be the same person whose name is subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that he signed, sealed, and delivered this instrument as his free and voluntary act.

Given under my hand and notarial seal this 23 day of February, 2009.



Notary Public

My commission expires: Feb. 20, 2012

